

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

BOBBY CAMPBELL (01)
SONIA CANTU (02)

Criminal No. 4:18-mj-423

CRIMINAL COMPLAINT

Conspiracy to Possess with Intent to Distribute a Controlled Substance
(Violation of 21 U.S.C. § 846)

Beginning in or before August 2017, and continuing thereafter until in or around July 2018, in the Fort Worth Division of the Northern District of Texas, and elsewhere, defendants **Bobby Campbell** and **Sonia Cantu**, along with others, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(B), namely to possess with intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 846 (21 U.S.C. § 841(a)(1) and (b)(1)(B)).

I, the undersigned Complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

Introduction

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF).
2. I have participated in and am familiar with this investigation through interviews, surveillance, and police reports.
3. This affidavit is submitted in support of an application for a criminal complaint.

Facts

4. On July 11, 2018, an agent with the Texas Department of Public Safety Criminal Investigation Division (DPS) observed a black, Saturn, sport-utility vehicle commit a traffic violation in Fort Worth, Texas. The DPS Agent communicated the traffic violation to a DPS Trooper in a marked patrol unit. The Trooper conducted a traffic stop on the vehicle for the violation. The vehicle was bearing a false/ fictitious license plate. The Trooper made contact with the driver, identified as Bobby Campbell. Campbell was the sole occupant. The Trooper observed that Campbell was extremely nervous and shaky. The Trooper asked for consent to search the vehicle. Campbell consented. A search of the vehicle resulted in the seizure of cash in Campbell's wallet, a large bundle of cash in the trunk, a black handgun, and bags containing methamphetamine weighting approximately 217 grams. The Trooper also recovered bags containing marijuana, pills, and drug paraphernalia.

5. During a post-Miranda interview, Campbell admitted to regularly obtaining large quantities of methamphetamine and redistributing the methamphetamine to several individuals in the Fort Worth area. Further, Campbell admitted to supplying Sonia Cantu with large quantities of methamphetamine.

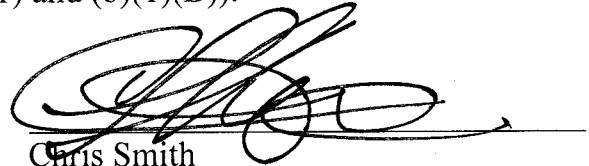
6. On July 11, 2018, DPS Agents conducted surveillance of a Comfort Inn in Fort Worth. DPS Agents had prior knowledge that Campbell and Cantu occupied the room as a residence. Agents also had prior knowledge that Cantu had an active State arrest warrant. Agents observed Cantu exit the hotel and leave in a silver, Chrysler 200 with a dealer plate.

A Fort Worth Police Department (FWPD) officer in a marked patrol unit conducted a traffic stop of the above vehicle and identified the driver as Star Cantu, Sonia Cantu's daughter, and passenger Sonia Cantu. FWPD officers smelled the odor of marijuana emitting from the vehicle. FWPD conducted a probable-cause search of the vehicle and placed Sonia Cantu into custody for the outstanding State arrest warrant.

7. DPS Agents obtained consent to search Cantu's room at the Comfort Inn hotel. During the search of the room, Agents located a safe. Campbell admitted the safe contained drugs and firearms. Campbell provided the combination and attempted to open the safe. However, Campbell stated he normally utilizes a key to access the safe. Due to the complexity of the safe, Cantu, who regularly uses the combination to unlock the safe, unlocked the safe for the Agents. The safe contained marijuana, Xanax bars, four firearms and ammunition. Agents also located drug paraphernalia, including methamphetamine pipes, scales, and baggies in other areas of the room. Campbell stated he purchased and/or traded the firearms for illegal narcotics from several different individuals.

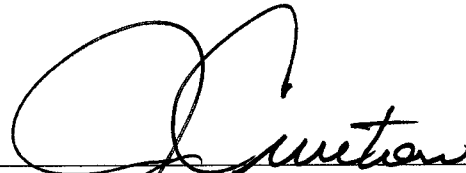
8. During a post-Miranda interview, Cantu admitted to obtaining large amounts of methamphetamine from Campbell and redistributing the methamphetamine to several individuals in the Fort Worth area. Cantu stated, from approximately December 2017 to July 2018, she distributed at least three ounces (84 grams) of methamphetamine per week.

Based on the foregoing, I believe that **Bobby Campbell** and **Sonia Cantu** have violated 21 U.S.C. § 846 (21 U.S.C. § 841(a)(1) and (b)(1)(B)).

A handwritten signature in black ink, appearing to read 'Chris Smith', written over a horizontal line.

Chris Smith
Special Agent
Bureau of Alcohol, Tobacco, Firearms
and Explosives

SWORN AND SUBSCRIBED before me, at 8:50 ~~am~~ ^{pm}, this 16th day of July,
2018, in Fort Worth, Texas.

A handwritten signature in black ink, appearing to read 'Jeffrey L. Cureton', written over a horizontal line.

JEFFREY L. CURETON
United States Magistrate Judge